



February 2, 2017

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NPDES PERMITS BRANCH  
(3WP41)

VIA EMAIL AND CERTIFIED U.S. MAIL,  
RETURN RECEIPT REQUESTED  
conway.bette@epa.gov

Bette Conway, LPG  
NPDES Permits Branch (3WP41)  
Water Protection Division  
U.S. Environmental Protection Agency  
1650 Arch Street  
Philadelphia, PA 19103-2029

Re: Duquesne Light Company – Warwick Mine No. 2 Preparation Plant  
CMAP No. 30841602 and NPDES Permit No. PA0215562  
Request for Information Pursuant to Section 308 Dated April 8, 2016

Dear Ms. Conway:

Per Don Bluedorn's email of October 19, 2016 to Doug Frankenthaler and discussion on January 18, 2017, this letter presents Duquesne Light Company's ("Duquesne Light") revised proposed whole effluent toxicity ("WET") testing program in response to the United States Environmental Protection Agency's ("EPA") April 8, 2016 "Request for Information Pursuant to Section 308 of the Clean Water Act" (the "Request") and EPA's letter dated September 27, 2016. Without waiving any of the objections and/or responses set forth in our response of June 6, 2016, and to the contrary expressly reserving those objections and responses and any other objections, defenses, and/or remedies available to it under law or equity, Duquesne Light presents the following.

The proposed program closely tracks the information requested in Paragraphs 32 and 35 of the Request. As discussed between Don Bluedorn and Rick Wiedman and Doug Frankenthaler, Duquesne Light still objects to the information requested in Paragraphs 33 and 34 of the Request. Per communication between Don Bluedorn and Doug Frankenthaler, we understand that USEPA agrees that the information requested in Paragraphs 33 and 34 is not required at this time.

Please note that Outfalls 002 and 007 are the only outfalls at the facility, and as such there are no references to "upstream outfalls."



### WET Testing Program

WET testing will be conducted once per month for six (6) consecutive months at each Outfall 002 (Latitude: 39° 49' 04", Longitude 79° 57' 12") and Outfall 007 (Latitude 39° 48' 59", Longitude 79° 57' 19") (provided of course that there is a discharge during the month), as provided below:

- a. The WET testing shall be chronic WET testing using *Ceriodaphnia dubia* as the test species. While Duquesne Light believes that chronic testing is not appropriate given the nature of the discharge and USEPA's chronic testing protocol, chronic tests will be conducted at the request of USEPA.
- b. The sampling location for these tests will be the nearest accessible point after final treatment, but prior to actual discharge and mixing with the receiving water. The established NPDES compliance sampling locations for Outfall 002 and 007 meet this condition and therefore will be used for the program. These sampling locations are located in the respective discharge pipes, just prior to final discharge into Whiteley Creek.
- c. Each test will be performed using grab samples. The objective is to collect three relatively evenly spaced grab samples over the course of a week, considering the facility's days of discharge, and to provide for use of each sample for a similar duration during the test. Grab sampling is judged to be appropriate because the discharge is not highly variable.
- d. The tests will be performed pursuant to EPA Test Method Number 1002.0: *Ceriodaphnia dubia* survival and reproduction test –*Short Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms 4<sup>th</sup> Edition (October 2002) USEPA Doc. No. EPA-821-R-02-013*. Chronic toxicity units ("TUc") will be calculated using the IC25.
- e. All WET testing will be performed by EA Engineering, Science, and Technology, Inc., PBC.'s WET laboratory, which is a NELAC certified laboratory certified for WET testing (NELAC No. 87550).
- f. Duquesne Light shall initiate the first set of WET testing at Outfalls 002 and 007 within 60 days of receipt of EPA written concurrence/approval of the program.
- g. Results will be compiled into a Testing Report which will be submitted to EPA within 60 days of completion of the WET testing program. The Testing Report will be prepared in accordance with Section 10 of the referenced test method document listed above, and



shall include copies of all original bench sheets, chain of custody forms, as well as concurrent reference toxicant test data and water chemistry analysis, as listed below.

Reasonable best efforts will be used to ensure that WET samples are not adversely affected by precipitation events (which would be extremely unlikely in any event, given the configuration and operation of the treatment facilities). If a precipitation event precedes a WET sampling event by less than 48 hours, the relevant precipitation and outfall flow data will be reported as well.

Effluent flow and stream flow will be recorded, and chemistry analysis for the following constituents will be conducted on the grab sample that is collected for the WET tests. These results also will be used (in part) to satisfy the sampling requested in Paragraph 31 of the Request (separate samples will not be taken on that day).

- Osmotic Pressure (by direct OP analysis)
- Selenium (EPA 200.8)
- TDS (Standard Method 2540C)
- Magnesium (EPA 200.7)
- Potassium (EPA 200.7)
- Sodium (EPA 200.7)
- Barium (EPA 200.7)
- Strontium (EPA 200.7)
- Bromide (EPA 300.0)
- Chloride (EPA 300.0)
- Nitrate+Nitrite-N (EPA 300.0)
- Sulfate (EPA 300.0)
- Alkalinity (Standard Method 2320B)
- Bicarbonate (Standard Method 2320B)
- Calcium Carbonate (Standard Method 2320B)
- Specific Conductance (Standard Method 2510B)
- Hardness (Standard Method 2340C)

If necessary, Duquesne Light can discuss this proposal with you after you have had a chance to review it. Please contact me at 412.393.7955 or at [dwesolowski@duqlight.com](mailto:dwesolowski@duqlight.com) if you have any questions or desire additional information.



Sincerely,

A handwritten signature in black ink, appearing to read "Daniel Wesolowski".

Daniel Wesolowski, PE, CSP  
Senior Manager, Safety Health, & Environmental  
Duquesne Light Company  
2825 New Beaver Avenue,  
Pittsburgh, PA 15233 – Mail Drop N6-TNG

cc: J. Bigi  
L. Steele, Esq.  
M. Amendola, P.E.  
T. Maher, P.G.  
D. Bluedorn, Esq.